

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

AMERICAN ALLIANCE
FOR EQUAL RIGHTS,

Plaintiff,

v.

PERKINS COIE LLP,

Defendant.

Case No. 3:23-cv-01877

**JOINT MOTION TO EXTEND
PRELIMINARY INJUNCTION BRIEFING SCHEDULE
AND RESPONSIVE PLEADING DEADLINE**

Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, Plaintiff American Alliance for Equal Rights and Defendant Perkins Coie LLP (collectively, “the “Parties”) jointly request that the Court modify the below deadlines as follows:

- Extend the deadline for Defendant to file its opposition to Plaintiff’s motion for a preliminary injunction, Dkt. 7, to October 9, 2023; and
- Extend the deadline for Defendant to answer or otherwise respond to the Complaint to 21 days after the final resolution of the motion for a preliminary injunction, including interlocutory appeal, if any.

In support of this request, the Parties state the following:

1. Plaintiff filed its Complaint, Dkt. 1, on August 22, 2023.

2. Plaintiff filed its Motion for Preliminary Injunction, Dkt. 7, on August 28, 2023. Accordingly, Defendant's opposition to Plaintiff's motion is currently due on September 18, 2023, *see* Local Civ. R. 7.1(e). Plaintiff's reply is currently due on October 2, 2023, *see* Local Civ. R. 7.1(f).

3. Defendant agreed to waive service of the Complaint and motion. Plaintiff provided Defendant with a waiver of service form on September 11, 2023.

4. Defendant has only recently engaged counsel in this matter and requires additional time to finalize its opposition to Plaintiff's motion for a preliminary injunction.

5. Defendant will begin accepting applications for the 2024 1L program on November 15, 2023.

6. Defendant will cease accepting applications for the 2024 1L program on January 7, 2024.

7. Defendant will select fellows on a rolling basis, with the goal of having the class finalized by no later than the first week of March 2024.

8. Defendant projects that the 2024 1L program will run approximately from May 20, 2024 to July 26, 2024.

9. The Parties therefore respectfully submit that good cause exists for the Court to extend: (i) the deadline for Defendant to file its opposition

to Plaintiff's motion for a preliminary injunction to October 9, 2023; and
(ii) the deadline for Defendant to answer or otherwise respond to Plaintiff's
Complaint to 21 days after the final resolution of the motion for a
preliminary injunction, including interlocutory appeal, if any.

10. The Parties certify that this is their first request for an
extension of time for this purpose, this extension is not requested for the
purpose of undue delay, and this extension will not prejudice the conduct of
the litigation.

Date: September 13, 2023

Respectfully submitted,

/s/ Jared D. Eisenberg _____

Jared D. Eisenberg
Texas State Bar No. 24092382
jeisenberg@lynllp.com
Christopher J. Schwegmann
Texas State Bar No. 24051315
cschwegmann@lynllp.com
Eric W. Pinker
Texas State Bar No. 16016550
epinker@lynllp.com
LYNN PINKER HURST & SCHWEGMANN LLP
2100 Ross Avenue
Suite 2700
Dallas, TX 75201
(214) 981-3800

Ishan K. Bhabha*
D.C. Bar No. 1015673
ibhabha@jenner.com
Andrianna D. Kastanek*
IL Bar No. 6286554
akastanek@jenner.com
Lauren J. Hartz*
D.C. Bar No. 1029864
lhartz@jenner.com
Marcus A.R. Childress*
D.C. Bar No. 155843
mchildress@jenner.com
Erica Turret*
D.C. Bar No. 1735511
eturret@jenner.com
Jenner & Block LLP
1099 New York Avenue, NW
Suite 900
Washington, D.C. 20001
(202) 639-6000

*Attorneys for Defendant
Perkins Coie LLP*

*pro hac vice forthcoming

/s/ Cameron T. Norris (with permission)

Cameron T. Norris*
(TN Bar No. 33467)
Tiffany H. Bates*
(VA Bar No. 94166)
Steven C. Begakis***
(VA Bar No. 95172)
James F. Hasson
(TX Bar No. 24109982)
CONSOVOY McCARTHY PLLC
1600 Wilson Blvd
Suite 700
Arlington, VA 22209
(703) 243-9423
cam@consovoymccarthy.com

Adam K. Mortara**
(TN Bar No. 40089)
LAWFAIR LLC
40 Burton Hills Blvd
Suite 200
Nashville, TN 37215
(773) 750-7154
mortara@lawfairllc.com

*Attorneys for Plaintiff American Alliance
for Equal Rights*

*pro hac vice

**pro hac vice forthcoming

***member of the Northern District of
Texas who resides in Fort Worth

CERTIFICATE OF SERVICE

I hereby certify that on September 13, 2023, I electronically filed the foregoing document with the Clerk of Court using the Court's CM/ECF system, which will automatically send email notification of such filing to all counsel of record.

/s/ *Jared D. Eisenberg*
Jared D. Eisenberg